whose equipment can be retuned, will be disrupted and disturbed in their quiet enjoyment of a system they find no reason to replace. It follows that the SMR Entrepreneurs' customers, when presented with the opportunity to change out equipment or keep their current equipment by signing up with the "new" operator on the desirable 861-865 MHz band, will choose to migrate to Nextel as their new provider if Nextel is allocated the existing operators' frequencies.

In South Carolina, for example, SCCLP encountered substantial customer problems when it merely changed out one of its interconnected switches and had to reprogram approximately 300 customers units. This took several months to accomplish for only a fraction of SCCLP's users. The affected customers were very upset about the process, and SCCLP had to provide financial credits for claimed inconvenience and lost service in order to maintain customer confidence.

As noted above, Nextel has rights to 48 channels in the 861-865 band in Boise, ID which are <u>not</u> in operation. Without ever competing head to head, Nextel is proposing that the FCC provide it with the frequencies currently used by its largest competitor in the market, and hand Nextel the effective tools to destroy its competitor's business development of the licensed spectrum band, and raid the customer base by creating customer dissatisfaction with the relocation. Nextel proposes that <u>it</u>, not the FCC select the relocation channels, based on market availability! Nextel proposes that <u>it</u> would pay for and take care of this "transparent"

retuning - which would expose existing customers to Nextel either through the "retuning" and "change-out" process, create resentment against the existing operator who lost the valuable channels, and otherwise disrupt the years of business goodwill on which much of this service depends.

VI. NEXTEL'S PROPOSAL IS INCONSISTENT WITH THE REGULATORY PARITY PROVISIONS OF THE 1993 BUDGET ACT AND SECTION 332(c)(1)(C) OF THE COMMUNICATIONS ACT.

The genesis of the "regulatory parity" requirement was the recognition by Congress that:

> [u]nder current law, private carriers are permitted to offer what are essentially [cellular] common carrier services, interconnected with the public switched network, while retaining private carrier status. Functionally, these 'private carriers' have become indistinguishable from common carriers but private land mobile carriers and common carriers are subject to inconsistent regulatory treatment.

U.S.C.C.A.N., Legis. History, 103rd Cong., 2nd Sess., at p. 586-87 (citations omitted). Congress was concerned that such regulatory disparities "could impede the continued growth and development of commercial mobile services and deny consumers the protections they need if new services such as PCS were classified as private." Id. at 587. Therefore, Section 6002(d)(3)(B) of the 1993 Budget Act authorizes the FCC to:

> . . . make such other modifications as may be necessary and practical to assure that [CMRS] licensees . . . are subjected to technical requirements that are comparable to the technical requirements that apply to licensees that are providers of substantially similar common carrier services.

(Emphasis added). At the same time, Congress wanted to protect consumers, not only through traditional Title II protections, but also by ensuring that the commercial mobile services were offered competitively. Thus, Congress amended Section 332 of the Communications Act to require the FCC to review annually competitive market conditions with respect to CMRS. Specifically, "as part of making a determination with respect to the public interest" the FCC is required to:

> consider whether the proposed regulation (or amendment thereof) will promote competitive market conditions, including the extent to which such regulation (or amendment) will enhance competition among providers of commercial mobile services.

47 U.S.C. § 332(c)(1)(C) (1993).

Based on the "substantially similar" language of Section 6002(d)(3)(B) alone and ignoring the competitive provisions of Section 332(c)(1)(C), Nextel argues that to achieve "regulatory parity" with cellular service providers,[28/] it needs the exclusive use of comparable blocks of spectrum in designated market areas:

> In order to achieve Congress' mandate that comparable CMRS mobile communications services be regulated similarly, the Commission must modify its existing licensing scheme for the Specialized Mobile Radio ("SMR") service to create geographically-defined licensing areas for Enhanced Specialized Mobile Radio ("ESMR") systems.

[28/] Nextel's position is that giving it an exclusive block would enhance competition with cellular. This is in fact not correct, since the experience of Mitchell and Advanced is that Nextel's ESMR "Digital Mobile" pricing in Los Angeles is equivalent to cellular. See also Nextel 10-K at 15 (June 8, 1994). Nextel ignores that its proposal would substantially decrease competition in the fleet/dispatch market.

Nextel Comments at 3-4. Under Nextel's plan, the FCC would designate 200 of the total 280 channels currently allocated to the SMR service to ESMR. However, because traditional SMR service is not substantially similar to either ESMR or cellular service, the Commission cannot, consistent with the statutory provisions cited above, implement Nextel's proposal as a means of achieving regulatory parity between ESMR and cellular.

Moreover, Nextel's proposal will not enhance competition among CMRS providers. Rather, its adoption would actually reduce competition in the mobile radio markets by destroying the viability of traditional SMR dispatch operations, and allowing Nextel to monopolize the fleet dispatch market.

A. Traditional SMR Service is Not "Substantially Similar" to Cellular Services.

The Commission correctly observes that its analysis of the "substantially similar" phrase in the Act should "focus primarily on the services provided to end users and the extent to which such services meet substantially similar customer needs and demands." NPRM at ¶ 13.

Nextel's own business plans recognize that cellular telephone service is a different market from dispatch/fleet communications. See discussion at Section II and Nextel Form 10-K at 3. Seventy-eight percent (78%) of the traditional SMR business nationwide is local dispatch-type communications. This is in contrast to cellular telephone service which is prohibited from providing dispatch communications and has nationwide roaming capabilities.

There are other substantial differences between traditional SMR service on the one hand, and wide-area SMR services, such as Nextel's ESMR operations, and cellular service on the other. These differences were also recognized by the FCC in the Notice:

> Like IMTS systems, traditional SMRs typically utilize small numbers of paired channels and provide service with a blocking probability much higher than two percent. This in contrast to cellular systems, which reuse large numbers of channels and provide service with a blocking probability of less than two percent. Traditional SMRs also typically use high-power base station transmitters located at high elevations in order to maximize the service range of each station, while cellular systems use multiple low-power sites with moderate service ranges and reuse their channels at relatively short intervals.

NPRM at n.28 (emphasis added). As discussed in Section III above, maximizing service range from a single cell has resulted in SMR being able to provide its customers with a cost-effective service, through lower capital investment requirements, compared to building a cellular telephone system. As a result, SMR fleet/dispatch service can be provided to customers at air-time prices as much as 40% less than current cellular telephone pricing.

The statute gives the FCC sufficient flexibility to find that it is in the public interest to preserve the substantially dissimilar traditional SMR market in order to enhance competition generally in the CMRS market. The Commission itself recognizes that Congress gave it broad discretion to modify its rules to the extent "necessary and practical." NPRM at ¶ 20. There is no rigid requirement that the FCC must apply uniform regulatory treatment to all CMRS providers, particularly if so doing would relegate

thousands of traditional SMR licensees to a second-class service with little or no potential for future growth.

B. Nextel's Proposal Is Anti-Competitive.

As noted above, Congress specifically instructed the FCC to consider whether any proposed regulation or amendment "will enhance competition among providers of commercial mobile services." 47 U.S.C. § 332(c)(1)(C). Although the FCC does not enforce the antitrust laws, it is the FCC's responsibility to "refuse licenses or renewal to any person who engages or proposes to engage in practices which will prevent either himself or other licensees or both from making the fullest use of radio facilities."[29/] While the FCC has "rejected the contention that large size per se is an evil in the communications industry,"[30/] the ability of a Commission licensee to control access to essential facilities and equipment and lessen competition are relevant to the FCC's determination of whether a proposal is in the public interest.[31/]

Nextel's proposal is not in the public interest because it will allow Nextel to dominate the ESMR market by severely limiting the eligibility of potential competitors to become ESMR licensees.

[29/] FCC Report on Chain Broadcasting (1941), quoted in National Broadcasting Co, inc. v. United States, 319 U.S. 190, 223-224 (1943).

[30/] Teleprompter Corporation, 87 F.C.C.2d 531, 542 (1981).

[31/] 15 U.S.C. § 21 specifically authorizes the FCC to enforce compliance with Sections 13 (price discrimination), 14 (contracts promoting monopoly), and 18 (acquisitions which may create a monopoly) of Title 15 "where applicable to common carriers engaged in wire or radio communication or radio transmission of energy."

Nextel itself believes only one ESMR operator per MTA market would be viable. See Nextel Comments at 16. The proposal would also substantially reduce existing competition from SMR operators that would be limited to insufficient channel capacity to expand operations.

1. Nextel Seeks to Monopolize the ESMR Market.

Nextel is already the largest SMR operator in nine of the ten largest MSAs.[32/] In July 1993, Nextel consummated its merger with the third largest SMR operator in the United States, Dispatch Communications.[33/] Motorola, the largest SMR operator in the U.S. (and largest competitor in each of Nextel's existing major markets) has agreed to sell its 2,500 SMR licenses and systems throughout the U.S. to Nextel in exchange for stock.[34/] In addition, Nextel has announced the following transactions:

- entering into 23 separate agreements to acquire 746 SMR channels in major Florida cities;
- completion of the acquisition of PowerFone, which owns or controls significant SMR channels in Detroit, Cleveland, Columbus, Cincinnati, Indianapolis, St. Louis, Pittsburgh, Buffalo and Rochester;
- reaching an agreement to acquire control of AMS, a large SMR operator in Florida;

[32/] Nextel Form 10-K at 1.

[33/] After its merger with Dispatch Communications, Nextel became positioned to "serve markets with a combined population of 95 million people in areas approximately equivalent to 70 metropolitan statistical areas." 800 MHz EMSP Notice, 8 FCC Rcd. 3950 at n.7 (1993).

[34/] Communications Daily, November 10, 1993.

- acquisition of all of the SMR businesses, assets and SMR licenses held by Questar, which owns SMR systems in Nevada, Arizona, Oregon, Washington, Utah, Idaho and other western states;

- acquisition of all of the SMR businesses, assets and licenses owned by certain Advanced MobileComm companies which include SMR systems in Colorado, Nevada, Arizona and California; and

- an agreement to acquire 11 million shares of OneComm stock, which operators SMR systems in Colorado, Kansas, Oklahoma, Oregon, Washington and other western states.

Nextel Form 10-K at p.17-27. Nextel is thus uniquely positioned, both financially and geographically, to dominate the ESMR service market. Based on these acquisitions, the FCC should determine how much of the 1.5 million subscriber base Nextel will control when these acquisitions are completed, before making further policy judgments.

Adoption of Nextel's proposal would also allow it to dominate the ESMR equipment market through its vertical integration with Motorola. Nextel's ESMR system will employ Motorola's Integrated Radio System ("MIRS"), which is not compatible with other SMR or cellular equipment. Since Nextel is currently entrenched in most, if not all, of the major U.S. markets, any other SMR operator desiring to provide nationwide roaming capabilities will be forced to negotiate interoperability agreements with Nextel. Again, as Nextel's Form 10-K illustrates:

> Nextel will not be able to provide nationwide roaming service comparable to that currently available from cellular carriers unless and until Nextel and other SMR system operators in other major United States market areas construct MIRS systems and Nextel establishes suitable interoperability arrangements with such operators.

Id. at p.15. Through its vertical integration with Motorola, Nextel will be in a position to control both access to its ESMR system, as well as control the price of the necessary MIRS equipment.

2. Nextel's Proposed Rule Changes Will Reduce Both Potential and Existing Competition.

Nextel argues that "it is highly doubtful that any market can economically support more than one ESMR," Nextel urges the Commission award one (1) wide-area ESMR license in each Major Trading Area ("MTA"), and urges the FCC to limit the pool of eligible ESMR applicants to existing ESMR licensees or those who have ESMR applications pending as of August 10, 1994. Nextel comments at 16-17.

The existing, self-defined service areas of the 800 MHz SMR operators are equivalent to BTAs. Therefore, any analysis of SMR spectrum allocation should proceed on a BTA basis, not an MTA basis, as Nextel suggests.[35/] Nextel suggests a single MTA license because, as the largest SMR operator, MTA licensing increases Nextel's chances of obtaining the frequency block either on a pro-rata basis, as Nextel suggests, or through auctions, the more likely avenue for license assignment if such a block were created.

[35/] NABER refuses to endorse Nextel's request for the reallocation of SMR frequencies on an MTA basis. See NABER comments at 14-17.

The effect of Nextel's proposal would be to reduce the number of competitors in this band from approximately three (3) to six (6) SMR operators per BTA[36/] to a single operator in the much larger, state-sized MTA markets. This would reduce competition in this desirable band approximately twenty-fold from the present market structure because of the number of BTAs included within the larger MTA market area.[37/]

In addition, limiting eligibility as Nextel proposes by establishing a cut-off date of August 10, 1994, would simply codify Nextel's position to dominate the ESMR market. Nextel states that "[t]his cut-off date will prevent the Commission from being bombarded with ESMR applications upon the issuance of these rules." Nextel comments at 17. Nextel's proposal is aimed at precluding other competitors, particularly traditional SMR operators, from applying for wide-area SMR systems. Requiring the submission of wide-area ESMR applications by August 10, 1994 is ludicrous. With the comment deadline expiring only on July 11, 1994, the Commission could not possibly review the comments and draft an Order in sufficient time to give interested parties adequate notice of the

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[36/] Although licensed on a transmitter-by-transmitter basis, the SMR transmissions extend 35 miles in their protected areas, and provide, through owned or managed systems, service to markets equivalent to the Rand McNalley BTA markets.

[37/] For example, there are approximately 27 current SMR system managers and operators in the Salt Lake City Major Trading Area (MTA). The Salt Lake MTA includes eight (8) BTAs - Boise, ID; Twin Falls ID; Idaho Falls ID; Pocatello ID; Logan UT; Salt Lake City UT; Provo UT, and St George, UT. There are six (6) SMR operators in Boise, and approximately three SMR operators on average in each of the seven (7) other BTAs.

new regulations prior to August 10. The unreasonableness of Nextel's proposal simply affirms the suspicion that its motives are truly anti-competitive. Even if the FCC could conceivably find Nextel's proposal to be in the public interest, the statute expressly gives existing SMR licensees the right to continue to operate on their licensed frequencies during the three year transition period. This requirement alone would prevent the Commission from implementing any massive frequency reallocation of private land mobile frequencies prior to August 10, 1996, as Nextel has urged the Commission to do.

This is not the appropriate proceeding in which to consider a new frequency proposal, and the Regulatory Parity amendments to the Communications Act do not require consideration of this proposal by August 10. As NABER points out, similar proposals are part of the Part 90 "refarming" proceeding. As discussed below, Nextel's proposal should be tabled until the Commission reviews the competitive issues surrounding the retention or elimination of the dispatch ban on common carriers.

3. Nextel Would Circumvent the Current Dispatch Service Ban on Common Carriers.

Nextel seeks to capitalize on the fact that, as an SMR licensee, it will be in a position to continue to provide dispatch service, unlike the cellular systems with which it intends to compete. Nextel Form 10-K at 15. However, the anti-competitive concerns which lead to prohibiting cellular common carriers from

providing dispatch service,[38] remain. Although 47 U.S.C. §332(c)(2) gives the FCC authority to eliminate the dispatch prohibition, as the FCC recently concluded that "the record in this proceeding has not provided us with sufficient data to sustain an informed judgment regarding the effect that removal of the dispatch service ban may have in the dispatch marketplace."[39]

In fact, there is evidence to support the continuation of the dispatch ban in order to maintain the availability of cost-effective, low-volume fleet/dispatch communications. In order to move occasional use customers off the high capacity cellular systems, some cellular operators have increased prices for occasional use to the point where it becomes prohibitively expensive for such customers to continue service. As one company reported to the SEC:

> The [11,260 subscriber] cancellations experienced by the Company are primarily the result of the Company's effort to attract and retain higher volume users. The Company has continued to raise access fees which has resulted in the disconnection of the Company's low volume and least profitable customers.[40]

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[38] 47 C.F.R. § 22.529, 22.911.

[39] Second Report & Order, 9 FCC Rcd. 1411 at ¶ 105. Specifically, the Commission was concerned that "an immediate repeal could enable CMRS providers exert market power against traditional SMR systems that now offer dispatch." Id. at ¶ 104. The FCC correctly noted that its future decision regarding the dispatch ban "will continue to be guided by our objective to promote and protect competition, not specific competitors." Id. In the instant rulemaking, the FCC has indicated that it will consider "whether the dispatch prohibition should be retained or eliminated in an upcoming proceeding." NPRM at n.140.

[40] Centennial Cellular Corporation, SEC Form 10-K, August 30, 1993 at p.19.

This is what would happen to the traditional fleet/dispatch users on a cellular system. The dispatch customer's lower air-time use is one of the reasons Nextel gives for desiring to move into the cellular telephone market. Nextel Form 10-K at 15. Traditional SMR operators are ready, willing, and able to provide service to this market segment, and the FCC should preserve their ability to do so on the frequencies to which they have been licensed to avoid massive disruption of customer service. The Commission should not consider Nextel's proposal and only if it initiates a proceeding on the fleet/dispatch market.

VII. THE FORTY MILE RULE SHOULD BE ELIMINATED

The idea that wide-area service is limited to Nextel-type small cell operations is misplaced, and is in part a function of the hyperbole surrounding Nextel's continual efforts to convert the 800 MHz band from servicing the fleet/dispatch market to servicing the mobile telephone market at substantially higher prices and profit margins. Existing operators have established wide-area systems using existing transmitters licensed under the traditional SMR rules. Typically, these stations are located within the same geographic area, are licensed to a number of licensees, and are managed by a central business manager. The Private Radio Bureau permitted this management situation to develop because it became clear during the course of industry development in the 1980s that the SMR industry was being hindered in its service to the public by the 40-mile rule. Local dispatch and fleet customers in a market

generally desired service in an approximate 100-mile area of the central business district in a market, but were not interested in roaming much beyond that market area. SMR systems could meet that need by programming a series of SMR transmitters in that market to transmit the signals of a particular customer. The customer chooses the transmitters on which it desires service, and pays a fee for each transmitter to which it is programmed. This has developed to be an economical way to provide customer needs for mobile services inexpensively.

There has been another unfortunate side-effect of the 40-mile rule. While traditional operators in the smaller markets have been establishing wide-area systems through management agreements, the combination of the 40-mile rule and the loading requirements have combined to limit the number of frequencies that an SMR operator in a smaller market can operate or control at any one time. Those operators who played by the FCC's rules and did not attempt to warehouse frequencies through indiscriminate filings or requests for wide-area waivers, but who applied for frequencies only as they were needed or could be justified under the loading requirements, now find themselves at a disadvantage in finding new frequencies to continue the growth in their markets.

As a result, existing operators who are presently in the business and competing successfully in the smaller and medium-sized BTA markets and rural areas have established a wide-area framework using management agreements with existing licensees to establish a viable wide-area system at low cost to customers. As this business

developed, it became increasingly clear to the Private Radio Bureau that the 40-mile rule was impeding the development of the traditional wide area industry, and the rule should be eliminated. The Commission proposes to do so in this proceeding. NPRM at ¶ 72. The SMR Entrepreneurs support the FCC's proposal to eliminate the 40-mile rule.

VIII. CONCLUSION

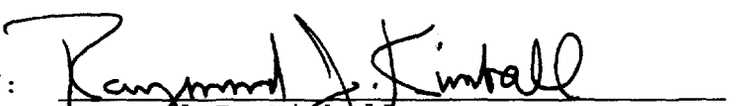
The traditional SMR operator has provided a necessary and demanded service at comparatively low prices using cost-effective equipment and an efficient technology to a substantial segment of the public. Traditional SMR operators provide a valuable public service to their customers, and provide a competitive, contemporary alternative to cellular service for those segments of the public that have a specific use and need, which is not served adequately by cellular telephone technology or prices. It is in the public interest for the FCC to preserve this market which the traditional SMR operator has developed through the years at its own risk and expense.

Nextel's proposal is self-serving. There is insufficient spectrum available to implement its proposal; Nextel's corporate intent is to dominate the 800 MHz SMR spectrum currently occupied by others; the proposed "retuning" would be expensive, disruptive to existing customers, and would serve Nextel's corporate purpose of invading the existing SMR operators' customer base. Customer

resistance to moving off the 861/865 MHz band would drive customers to Nextel.

Nextel's proposal should be summarily rejected. If it is not, it should be considered in the separate dispatch/fleet service rule making which the Commission anticipates implementing.

Respectfully submitted,

BY: 

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DATE: July 11, 1994

APPENDIX A

MEMBER COMPANIES

North Carolina Communications, Inc.
RCS Group Communications, Inc.
Communications Specialists of Wilmington
Communications Specialist of Raleigh
Communications Specialist of Jacksonville
Anser-Quik Plus
Business Autophone
Country Communications
Goldsboro Communications
Southern Communications
Savin & Hill Co.
Atlantic Telecom
Radio Communications, Inc.
Two Way Radio of Carolinas

APPENDIX B

Survey of 856-861 MHz Spectrum
in Boise, Idaho[1]

CHANNEL NUMBER	FCC ALLOCATION	RADIO SERVICE	LICENSEE	FREQUENCY	PENDING/ GRANTED
1.	SMR	YX	Gem Communications	856.0125	G
2.	SMR	YX	Cencall, Inc.**	.0375	P
3.	SMR	YX	Motorola, Inc.**	.0625	G
4.	SMR	YX	Steve Hale	.0875	G
5.	SMR	YX	James Cox	.1125	G
6.	SMR	YX	Cencall, Inc.**	.1375	P
7.	SMR	YX	Smart SMR, Inc.*	.1625	G
8.	SMR	YX	Martha Cooper	.1875	G
9.	Public Safety			.2125	
10.	Public Safety			.2375	
11.	Public Safety			.2625	
12.	Industrial	GO	Chevron USA	.2875	G

[1] Source: FCC Database per Interactive Systems, Inc. dated July 6, 1994.

* Subsidiary of Nextel
** Pending agreement to sell to Nextel

CHANNEL NUMBER	FCC ALLOCATION	RADIO SERVICE	LICENSEE	FREQUENCY	PENDING/ GRANTED
13.	Industrial			.3125	
14.	Industrial			.3375	
15.	Industrial	GO	Hecla Mining	.3625	G
16.	Industrial			.3875	
17.	Industrial			.4125	
18.	Public Safety			.4375	
19.	Public Safety			.4625	
20.	Public Safety			.4875	
21.	SMR	YX	Cencall, Inc.**	.5125	P
22.	SMR	YX	Cencall, Inc.**	.5375	P
23.	SMR	YX	Cencall, Inc.**	.5625	P
24.	SMR	YX	Cencall, Inc.**	.5875	P
25.	SMR	YX	Elizabeth Martone	.6125	P
26.	SMR	YX	Harold Stowe	.6375	G
27.	SMR	YX	Cencall, Inc.**	.6625	P
28.	SMR	YX	Gem Communications	.6875	G

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CHANNEL NUMBER	FCC ALLOCATION	RADIO SERVICE	LICENSEE	FREQUENCY	PENDING/ GRANTED
29.	Public Safety			.7125	
30.	Public Safety			.7375	
31.	Public Safety			.7625	
32.	Business			.7875	
33.	Business	YB	Hewlett Packard	.8125	G
34.	Business			.8375	
35.	Business			.8625	
36.	Business			.8875	
37.	Business			.9125	
38.	Public Safety			.9375	
39.	Public Safety			.9625	
40.	Public Safety			.9875	
41.	SMR	YX	Gem Communications	857.0125	G
42.	SMR	YX	Cencall, Inc.**	.0375	P
43.	SMR	YX	Motorola, Inc.**	.0625	G

* Subsidiary of Nextel
** Pending agreement to sell to Nextel

CHANNEL NUMBER	FCC ALLOCATION	RADIO SERVICE	LICENSEE	FREQUENCY	PENDING/ GRANTED
44.	SMR	YX	Steve Hale	.0875	G
45.	SMR	YX	James Cox	.1125	G
46.	SMR	YX	Cencall, Inc.**	.1375	P
47.	SMR	YX	Smart SMR*	.1625	G
48.	SMR	YX	Martha Cooper	.1875	G
49.	Public Safety			.2125	
50.	Public Safety			.2375	
51.	Public Safety			.2625	
52.	Industrial	GO	Chevron USA	.2875	G
53.	Industrial			.3125	
54.	Industrial			.3375	
55.	Industrial	GO	Hecla Mining	.3625	G
56.	Industrial			.3875	
57.	Industrial			.4125	
58.	Public Safety			.4375	
59.	Public Safety			.4625	

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** Pending agreement to sell to Nextel

CHANNEL NUMBER	FCC ALLOCATION	RADIO SERVICE	LICENSEE	FREQUENCY	PENDING/ GRANTED
60.	Public Safety			.4875	
61.	SMR	YX	Cencall, Inc.**	.5125	P
62.	SMR	YX	Cencall, Inc.**	.5375	P
63.	SMR	YX	Cencall, Inc.**	.5625	P
64.	SMR	YX	Cencall, Inc.**	.5875	P
65.	SMR	YX	Edward Sheerin	.6125	G
66.	SMR	YX	Harold Stowe	.6375	G
67.	SMR	YX	Cencall, Inc.**	.6625	P
68.	SMR	YX	Gem Communications	.6875	G
69.	Public Safety			.7125	
70.	Public Safety			.7375	
71.	Public Safety			.7625	
72.	Business			.7875	
73.	Business	YB	Hewlett Packard	.8125	G
74.	Business			.8375	
75.	Business	GX	Russell Lehmkuhl	.8625	P

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CHANNEL NUMBER	FCC ALLOCATION	RADIO SERVICE	LICENSEE	FREQUENCY	PENDING/ GRANTED
76.	Business			.8875	
77.	Business			.9125	
78.	Public Safety			.9375	
79.	Public Safety			.9625	
80.	Public Safety			.9875	
81.	SMR	YX	Gem Communications	858.0125	G
82.	SMR	YX	Cencall, Inc.**	.0375	P
83.	SMR	YX	Motorola, Inc.**	.0625	G
84.	SMR	YX	Steve Hale	.0875	G
85.	SMR	YX	James Cox	.1125	G
86.	SMR	YX	Cencall, Inc.**	.1375	P
87.	SMR	YX	Smart SMR*	.1625	G
88.	SMR	YX	Martha Cooper	.1875	G
89.	Public Safety			.2125	
90.	Public Safety			.2375	

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